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November 2, 2022

**VIA ECF**

Hon. P. Kevin Castel  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Hannah Morrison et al. v. City of New York, et al.  
21-CV-10647(PKC)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds, Corporation Counsel for the City of New York and am assigned to the defense in the above-referenced matter. The parties write to respectfully request the Court (1) suspend all deadlines while the parties await the Body Worn Camera ("BWC") footage from the alleged incident in question with the understanding that by November 30, 2022 the parties will file a joint status update with the Court, (2) adjourn the conference currently scheduled for November 9, 2022 to a date and time convenient to the Court after the November 30, 2022 letter is filed. See Civil Docket Entry dated October 23, 2022.

By way of brief background, plaintiffs allege *inter alia*, that they were falsely arrested and subjected to excessive force during demonstrations on September 17, 2020. By 11:00 p.m., that same day they were both released and given desk appearance tickets which were later dismissed. See Civil Docket Entry No. 1

As an initial matter, while scheduling a mediation session has been difficult given the schedule of the parties, the parties have had productive communication regarding settlement. During these discussions it became apparent that the NYPD BWC footage is essential to the parties' discussions. Defendants have requested the videos from the NYPD but have not yet received them. Once the videos are obtained the parties will be able to continue their settlement discussions and hopefully resolve this matter.

As such, the parties jointly respectfully request the Court (1) suspend all deadlines while the parties await the Body Worn Camera ("BWC") footage from the alleged incident in question with the understanding that by November 30, 2022 the parties will file a joint status update with the Court, (2) adjourn the conference currently scheduled for November 9, 2022 to a date and time

*Application to stay  
or "suspend all deadlines"  
is DENIED. Conference  
adjourned from November 9  
to February 10, 2023, at 11:30am  
Parties to submit  
proposed case management plan,  
scheduling order adjourn letter  
five  
days  
before  
conference  
SO  
ORDERED  
USDJ  
11-2-22*

convenient to the Court after the November 30, 2022 letter is filed. *See* Civil Docket Entry dated October 23, 2022.

Thank you for your consideration herein.

Respectfully submitted,

/s/ KellyAnne Holohan

KellyAnne Holohan  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: VIA ECF  
*All counsel of record*